

**USDA Child Nutrition Programs  
Administrative Review Summary Report**

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**School Food Authority:** Unity School District

**Agency Code:** 480238

**School(s) Reviewed:** Unity High School

**Review Date(s):** 2/27/19-2/28/19

**Date of Exit Conference:** 2/28/19

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State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

**General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state for \$10. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, meal benefit determination process, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training) webpage ([dpi.wi.gov/school-nutrition/training](http://dpi.wi.gov/school-nutrition/training)).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI [School Nutrition Training](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills) webpage ([dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills)).
- The US Department of Agriculture has a toolkit of resources to assist schools in meeting the nutrition standards on their [Healthier School Day: The School Day Just Got Healthier](http://www.fns.USDA.gov/healthierschoolday) webpage. The topics covered include Smart Snacks, offering fruits and vegetables, reducing sodium, and serving whole grain-rich products (<http://www.fns.USDA.gov/healthierschoolday>).
- [The Smarter Lunchrooms Movement](http://smarterlunchrooms.org) encourages schools to implement low-cost and no-cost lunchroom solutions to help students' select healthier meal options (<http://smarterlunchrooms.org>). Smarter Lunchroom techniques are easy to begin implementing and do help encourage student consumption of fruits, vegetables, legumes, non-flavored milk, and other healthful choices. These strategies are effective and

research-based. Consider trying the Smarter Lunchroom techniques for [increasing consumption of white milk](https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk) (https://www.smarterlunchrooms.org/scorecard-tools/smarter-lunchrooms-strategies#Milk).

### **Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at Unity School District for the courtesies extended to us during the on-site review. Thank you for being available when answering questions and providing additional information. All were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review. It was wonderful to see how well the Business Director and Food Service Director(FSD) work together and how they consistently checked in with one another.

The Business Director and Food Service Director expressed an interest in becoming a [CEP district](https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility) (https://dpi.wi.gov/school-nutrition/national-school-lunch-program/community-eligibility).

### **REVIEW AREAS**

#### **1. MEAL ACCESS AND REIMBURSEMENT**

##### **Certification and Benefit Issuance**

Free and Reduced Price Meal Applications

- There was a sample size of 266 students selected for the review. All of the applications were approved correctly. From Direct Certification, seven students were given the incorrect benefit.

Public Release

- SFA sent out the Public Release to multiple places for the 2018-2019 SY.

Direct Certification

- SFA was running Direct Certification matches in the required timeframes.

##### **Verification**

SFA did a great job with the verification process and completed it by November 15. The Verification Collection Report was also completed for the 2018-2019 SY.

##### **Meal Counting and Claiming**

Breakfast, lunch and the Wisconsin School Day Milk Program claims were verified on site. The edit checks supported the claims for the month of review.

#### **2. MEAL PATTERN AND NUTRITIONAL QUALITY**

##### **Commendations**

Thank you to the staff at Unity School District for their warm welcome and cooperation throughout the administrative review. Thank you, also, for all your questions, willingness to learn and quickly implement recommendations and required changes. It has been a pleasure working with your staff.

## **Comments/Technical Assistance/Compliance Reminders**

### **Week of Review - January 7-11, 2019**

Each entree option needs to meet the daily meal pattern requirements as well as the weekly meal pattern requirements. Since students are only able to select one entrée option, each entrée option offered is viewed as one “line” and is reviewed independently for meal pattern compliance.

The salad bar line does not have access to the fruits or vegetables on the main line. Due to this, there was a missing vegetable subgroup (starchy). This is not considered a repeat finding.

### **Meat/meat alternates on the Salad Bar**

There are multiple meat/meat alternates (usually two meat choices (2 oz eq each), shredded cheese (1 oz eq) and sometimes a whole egg (1.75 oz eq)) available for students to select on the salad bar. Currently, it is unclear how many servings of meat/meat alternate students may select with their reimbursable meal. For that reason, the reviewer reviewed meal pattern compliance based on students having the ability to select at least two servings of meat/meat alternate, each planned at 2 oz eq each. Because of this, the planned menu will have exceeded the recommended weekly maximum of 12 oz eq meat/meat alternate.

First, consider making the serving sizes for all meat/meat alternates credit the same amount. You may consider making each meat/meat alternate credit as 1 oz eq meat/meat alternate (eg, 1 scoop of turkey, ham or chicken = 1 oz eq meat/meat alternate; ¼ cup shredded cheese = 1 oz eq meat/meat alternate, ½ whole large egg = 1 oz eq meat/meat alternate). Second, add additional signage, to limit the students to select 2-3 scoops/servings of the meat/meat alternate. This should be easier for point of service staff to determine when to charge students for extra servings and it will reduce the amount of meat/meat alternate the students have access to over the course of the week.

### **Signage**

The signage on the salad bar is impressive! Excellent use of DPI’s salad bar template signage. It greatly helps students understand how much is the intended serving size for each food option.

### **Production Records**

Production records were neat and easy to read. Kitchen staff are doing a great job of writing in substitutions. Below are a few reminders:

- The production records need to include the menu type (ie, Lunch). Please add this detail to your record template.
- Production records should list the meal pattern used for each age/grade group served.
- Each menu item must have its own line. Ham, turkey and chicken were all listed on the same row on production records.

### **Monthly Menus**

Monthly menus must contain the non-discrimination statement. The menu for Unity School District had the incorrect non-discrimination statement. Technical assistance was provided and the food service director updated the menu to contain the correct statement: *This institution is an equal opportunity provider.* Thank you!

### **Field Trip Lunches**

Children on a field trip must be offered lunches that meet daily meal pattern requirements. Specific procedures must be followed, including maintaining the temperature of time/temperature control for safety (TCS) food, establishing a way to collect meal payments, and obtaining a count by eligibility category. If your school implements Offer versus Serve (OVS), OVS must be implemented, to the extent possible, during field trip meals as well. Allowing students to turn down at least one component meets the requirement of OVS. For example, you may offer the grain, meat/meat alternate, and vegetable together in a bag, then allow students to select from or turn down multiple fruit choices and at least two milk types. For more information, please reference the [Meals on Field Trips](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf) overview (<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/field-trip-meals-overview.pdf>).

### **Coffee Carts**

Coffee and espresso drinks are allowable beverages at the high school (grades 9-12) level. Ensure products are offered in acceptable portion sizes to be compliant with the Smart Snacks standards.

Accompaniments such as cream and sugar need to be included in the nutritional analysis of the coffee drinks; assess this by either determining the average amount of cream and sugar each student uses, or by planning for a specific amount of individual packets of cream and sugar to go with each beverage. The calories of the coffee, cream, and sugar needs to be added together when determining if the beverage meets the guidelines below.

Beverage Guidelines:

- Calorie-free beverages (for black coffee only)
  - <5 calories per 8 fl. oz.; ≤10 calories per 20 fl. oz.
  - Maximum serving size: 20 fl. oz.
  
- Lower-calorie beverages (for coffee with cream and/or sugar)
  - ≤40 calories per 8 fl. oz.; ≤60 calories per 12 fl. oz.
  - Maximum serving size: 12 fl. oz.

To help determine if coffee drinks are compliant, utilize the [Alliance for a Healthier Generation Smart Snacks Product Calculator](https://foodplanner.healthiergeneration.org/calculator/). If they are, you will be able to print a reference sheet showing compliance directly from the website as record keeping documentation. (<https://foodplanner.healthiergeneration.org/calculator/>).

### **School Breakfast**

To increase participation, consider offering alternative service models such as Breakfast in the Classroom or a mid-morning nutrition break district wide to help increase student participation.

Breakfast in the Classroom works well in elementary schools and mid-morning models work well in middle or high schools where they have a passing time to grab a meal between classes. This could be set up in the cafeteria or on mobile carts in the hallways. Refer to this helpful comparison chart of the [School Breakfast Program service models](http://breakfastfirst.org/wp-content/uploads/2013/04/ComparingBreakfastModels-10-03-2011.pdf) to identify what will work well for your school (<http://breakfastfirst.org/wp-content/uploads/2013/04/ComparingBreakfastModels-10-03-2011.pdf>).

### 3. RESOURCE MANAGEMENT

Based on the Resource Management Questionnaire, the SFA triggered for a comprehensive review of the Nonprofit Food Service Account, Paid Lunch Equity and Revenue from Nonprogram Foods. Documentation was provided to support the comprehensive review.

#### **Nonprofit School Food Service Account**

Everything in the food service account is transparent and has supporting documentation.

#### **Unpaid Meal Charge Policy**

SFA had an updated unpaid meal charge policy on file.

#### **Paid Lunch Equity**

SFA had a positive fund balance and did not have to increase their overall prices, but chose too.

#### **Revenue from Nonprogram Foods**

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All costs associated with nonprogram foods, including food, labor, equipment, and purchased services must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Thus nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Nonprogram Food costs and revenues must be separated from Program food costs and revenues.

The USDA Nonprogram Revenue Tool must be completed yearly, at a minimum. The [DPI Nonprogram Food Revenue Tool/Calculator](#) located on our website feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the USDA nonprogram food regulation (<http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>).

#### **Indirect Costs**

SFA was not charging any indirect costs to the food service account.

### 4. GENERAL PROGRAM COMPLIANCE

#### **Civil Rights**

SFA was following USDA civil rights regulations.

#### **On-site Monitoring**

N/A to SFA

#### **Local Wellness Policy**

SFA had a wellness policy on file. The policy was missing information about public involvement, updating the public on the policy and the triannual assessment.

Resources:

- Please refer to the USDA [summary of the requirements](http://www.fns.usda.gov/sites/default/files/tn/LWPsummary_finalrule.pdf) for local school wellness policies (http://www.fns.usda.gov/sites/default/files/tn/LWPsummary\_finalrule.pdf).
- USDA Food and Nutrition Service has information on the [local school wellness policy](https://healthymeals.nal.usda.gov/school-wellness-resources) process and wellness policy elements (https://healthymeals.nal.usda.gov/school-wellness-resources).
- Wisconsin Team Nutrition has several [wellness policy resources](http://dpi.wi.gov/school-nutrition/wellness-policy) available, including a toolkit, a wellness policy builder, and wellness policy report card (http://dpi.wi.gov/school-nutrition/wellness-policy).

### **Smart Snacks**

The Kemps frozen yogurt 8oz serving size is not smart snack compliant. This size exceeds the allowed amount for calories and sodium.

### **Professional Standards**

Professional standards requirements were being met. Food service director was updating the tracking tool after the trainings.

### **Water**

Water was available for breakfast and lunch.

### **Food Safety**

SFA was actively using the food safety plan, had the appropriate SOPs on file and the FSD kept detailed reports of any food safety issues. Food safety inspections & Employee Reporting Agreements were on file. SFA had a sharing table and was following the proper protocols.

\*Reminder that TCS foods cannot be re-served to students.

### **Buy American**

#### **Commendations**

The food service director maintains the appropriate documentation for non-domestic product purchased. Nicely done!

#### **Comments/Technical Assistance/Compliance Reminders**

If no country of origin is identified on the label, the SFA must get certification from the distributor or supplier stating, "We certify that (insert product name) was processed in the U.S. and contains over 51% of its agricultural food component, by weight or volume, from the U.S.," This can be accepted in an email. Labels should indicate if the product is grown, processed, and packaged in the continental U.S. or any U.S. Territory. If the label indicates that the product is distributed or packed in the U.S, but the country of origin is not listed, this product requires the distributor's certification as mentioned above.

The following information must be recorded on a Buy American Non-Compliant Product List.

*Note:* In reference the competitive procurement process, this form may be valid up to the full duration of the contract. DPI allows for a max-term of 5 years with all contracts.

When completing the [Buy American Non-Compliant Product list](#) there are 4 pieces of information that must be recorded:

1. Date
2. Name of product

3. Country of origin
4. Reason
  - a. **Cost analysis** – SFA determined the cost of the domestic product when compared to the non-domestic product was above the predetermined allowable cost difference established by the SFA.
    - i. *Ex. If domestic product costs 20% more than non-domestic product, and no domestic option/alternative is available, then SFA will purchase non-domestic product.*
  - b. **Seasonality**- Product(s) is not available domestically during certain times of the year. (SFA is required to record or list the months that the domestic product is not available.)
    - i. *Ex. Blueberries are not available domestically during the months of December – June.*
  - c. **Availability** – Product(s) is not available to purchase domestically.
    - i. *Ex. pineapples, bananas, mandarin oranges, and black Pepper/other spices.*
  - d. **Substitution**- In the event a domestic product is unavailable due to a distributors' inability to provide, a substitution of product(s) may occur. (The SFA is required to record the reason the distributor substituted the product.)
    - i. *Ex. At the time of ordering/shipping domestic products was unavailable/damaged at distributor site and domestic options could not be substituted and as a result non-domestic products was substituted in its place.*
  - e. **Distribution**- the SFA's contracted distributor is unable to source domestic products and as a result, distributor does not carry the domestic product(s). (The SFA is required to record the reason the distributor carries the non-domestic product.)
    - i. *Ex. Due to supply, chain constraints, recall of domestic product by processor, SFA contracted distributor was unable to source domestic product leaving only non-domestic option available for order fulfillment.*
  - f. **Other**- Please provide a written explanation.
    - i. *Ex. The SFA received a donation of non-domestic oranges*
    - ii. *Ex. The SFA did not use School's Nonprofit Food Service Account to purchase the non-domestic products.*

You may record additional information if you find it beneficial. A suggested [Buy American - Non Compliant Product List template](https://dpi.wi.gov/school-nutrition/procurement/buy-american) can be found on the [Buy American webpage](https://dpi.wi.gov/school-nutrition/procurement/buy-american) (<https://dpi.wi.gov/school-nutrition/procurement/buy-american>).

### **Reporting and Recordkeeping**

Records kept on file for 3 years plus the current. Documentation went back to 2008!

### **Summer Food Service Program (SFSP) and School Breakfast Program (SBP) Outreach**

SFA operates both programs.

## **5. OTHER FEDERAL PROGRAMS REVIEWS-NOT APPLICABLE TO SFA**

### **Corrective Action Needed**

## 1. MEAL ACCESS AND REIMBURSEMENT

### ***Findings and Corrective Action Needed: Counting and Claiming***

- Counting and Claiming Finding #1:** Seven students were receiving the incorrect benefit.

**Corrective Action Needed #1:** Send the household the adverse action that was sent to the SFA via e-mail. For a better benefit, change the benefit within 3 days. For a lesser benefit, change the benefit after 10 calendar days. Send a copy of the letter sent to the households to the Nutrition Program Consultant by e-mail once completed. **Completed on site, no further action required.**

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

- Finding #1:** Missing vegetable subgroup (starchy) on the salad bar line.

**Corrective Action Needed:** Submit a statement that explains what you will do to add the required amount of starchy vegetable over the course of the week.

- Finding #2:** Meat/meat alternate exceeds the recommended weekly max on the salad bar line.

**Corrective Action Needed:** Submit a statement with your plan to reduce the amount of meat/meat alternate that students may select on the salad bar line. If you add additional signage, include a picture.

*Once the Public Health Nutritionist has all crediting documentation and updated standardized recipes for the week of review, it can be analyzed to determine if the meal patterns for the National School Lunch Program and School Breakfast Program are being met. Until that time, the review cannot be closed. Please be aware that the possibility to conduct a weighted nutrient analysis exists if substantial errors are found. Additional errors may require additional corrective action and may also be subject to fiscal action.*

## 3. RESOURCE MANAGEMENT (RM)

### ***Findings and Corrective Action Needed: Nonprogram Foods***

**RM Finding #1:** The Nonprograms Food Revenue Tool for the 2018-2019 SY has not been completed.

**Corrective Action Needed #1:** Submit a copy of the Nonprogram Foods Revenue Tool to the Nutrition Program Consultant.

## 4. GENERAL PROGRAM COMPLIANCE (GP)

### ***Findings and Corrective Action Needed: Wellness Policy***

- RM Finding #1:** Pieces of the Wellness Policy were missing, including the triannual assessment, updating the public and public involvement.

**Corrective Action Needed:** Submit a timeline as to when the SFA plans to update the wellness policy.

***Findings and Corrective Action Needed: Smart Snacks***

☐ **RM Finding #2:** Kemps frozen yogurt (8 oz serving size) is not Smart Snacks compliant.

**Corrective Action Needed:** Submit a statement that states you will discontinue serving the 8 oz size.

**5. OTHER FEDERAL PROGRAMS REVIEWS (OTHER)**

Carolyn Stanford Taylor, State Superintendent of Wisconsin Department of Public Instruction, shares vision that every student will graduate prepared for college and career. Her goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students' success.

For more information on this initiative, please visit the Wisconsin DPI [Every Child a Graduate](https://dpi.wi.gov/statesupt/every-child-graduate) webpage (<https://dpi.wi.gov/statesupt/every-child-graduate>).

